

Engineering Statement and Interference Analysis

This technical statement supports this application for a digital low-power television station on channel 20 in Greenfield, California, FCC File No. BSFDTL-20060630ATU, Facility ID 167279.

On or about June 30, 2006, the Applicant and permittee of low power television station KSCZ-LP at Greenfield, California (Facility ID 68091) filed with the FCC an application for a digital companion channel facility to operation on channel 20 at Greenfield, California (BSFDTL-20060630ATU). In the Public Notice released on October 17, 2006, the FCC determined that the digital companion channel proposal of the Applicant on channel 20 is mutually exclusive with the digital companion channel proposal of JB Broadcasting on channel 19 at Templeton, California (K23ED, BSFDTL-20060630CZT, Facility ID 168787) and the digital companion channel proposal of Monterey County Superintendent of Schools on channel 18 at Salinas, California (K56AA, BSFDTL-20060630DAB, Facility ID 168795), in the designated MX Group 053. The parties in MX053 entered into a settlement agreement to resolve their mutual exclusivity. Subsequently, in the letter dated March 19, 2007, the FCC found the settlement agreement in compliance with Section 311(c) of the Communications Act and 73.3525 of the Commission's Rules and requested that the Applicant submit a complete FCC Form 346 for File No. BSFDTL-20060630ATU.

The proposed channel 20 facilities were studied using the Techware's tv_process_dlptv software on a Sun Blade 1500. It is believed that the proposed facility complies with the rule sections of 74.709, 74.793(e)-(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the FCC. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and Class A authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.